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SANDRA K. MARKHAM, CLERK
BY: 

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6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF YAVAPAI

8 STATE OF ARIZONA,

NO. P1300CR201001325

9 Plaintiff,

Division PTB

10 v.

STATE'S REQUESTED JURY INSTRUCTIONS

11 STEVEN CARROLL DEMOCKER,

12 Defendant.

13
14 The State of Arizona, by and through Sheila Sullivan Polk, Yavapai County Attorney, and
15 her deputy undersigned, pursuant to Rule 21.2, Arizona Rules of Criminal Procedure, hereby
16 respectfully requests the following R.A.J.I. jury instructions as follows.

17 Respectfully submitted this 1 day of August, 2011.

18
19 SHEILA SULLIVAN POLK
YAVAPAI COUNTY ATTORNEY

20 By 

21 Steven A. Young
22 Deputy County Attorney

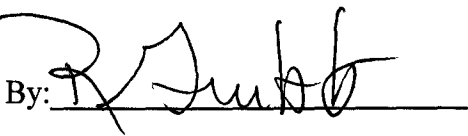
23 **COPY** of the foregoing **Emailed** this
1st day of August, 2011, to:

24 Honorable Warren R. Darrow
25 Division 6
Yavapai County Superior Court
26 Via email to Diane Troxell: DTroxell@courts.az.gov

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By: 

1 **STANDARD CRIMINAL JURY INSTRUCTIONS:**

- 2 1 - Duty Of Jury
- 3 2 - Lawyer's Comments Are Not Evidence
- 4 3 - Stipulations
- 5 4 - Evidence to Be Considered
- 6 5a - Presumption of Innocence
- 7 5b(1) - Burden of Proof (complies with *State v. Portillo*, 182 Ariz. 592 (1995))
- 8 6 - Voluntariness of Defendant's Statements
- 9 7 - Jury Not To Consider Penalty
- 10 9 - Flight or Concealment
- 11 11 - Multiple Acts (Counts IV; VIII)
- 12 15 - Defendant Need Not Testify
- 13 16 - Evidence of Any Kind
- 14 17 - Voluntary Act
- 15 18 - Credibility of Witnesses
- 16 20 - Witness (Prior Conviction), if applicable
- 17 21 - Indictment/Information Is Not Evidence
- 18 24 - Direct and Circumstantial Evidence
- 19 25 - Expert Witness
- 20 34 - Testimony of Law Enforcement Officers
- 21 35 - Separate Counts

22 **STATUTORY CRIMINAL JURY INSTRUCTIONS:**

- 23 11.05 - First Degree Premeditated Murder
- 24 15.08 - First Degree Burglary
- 25 15.01(2) - Definition of "Enter or Remain Unlawfully"
- 26 15.01(11) - Definition of "Residential Structure"
- 27 6.04 - Definition of "Dangerous Offense"
- 28 23.10 - Fraudulent Schemes and Artifices
- 29 10.031 - Elements of Conspiracy
- 30 10.0312 - Definition of "Overt Act" for Conspiracy
- 31 10.0313 - Conspiracy-Guilt of Substantive Offense
- 32 20.02 - Forgery
- 33 23.11 - Willful Concealment
- 34 28.09 - Tampering with Physical Evidence

35 **DEFINITIONS**

- 36 1.056(a)(1) - Definition of "Intentionally" or "With Intent To"
- 37 1.056(a)(2) - Intent-Inference
- 38 1.056(b) - Definition of "Knowingly"
- 39 1.056.01 - Included Mental State-Knowingly
- 40 1.058 - Definition of "Dangerous Instrument"

1 1.6(d) - Definition of "Especially Cruel, Heinous or Depraved"

2 STATUTES

3 A.R.S. § 13-3613 - Contributing to Delinquency of a Child

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